

IN THE UNITED STATES FEDERAL DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

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UNITED STATES OF AMERICA,
Plaintiff,

vs.

JOYCE RENEE KING
Defendants.

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CR. NO. 2:05-cr-00297- WHA

MOTION TO RELEASE ON BOND

COMES, James R. Cooper, Jr. who moves that this Court release the defendant pending sentencing and states in support thereof as follows:

1. Ms. King was originally free on bond pending trial. She did not keep in touch with the pre-trial officer, Donnelle Thompson and after a hearing, her bond was revoked. She now is housed in the Autauga County Jail.
2. Ms. King has seen the error of her ways. She has constructed a program when carries a very high degree of compliance with Ms. Thompson's requests.
3. A comprehensive plan to guarantee compliance has already been sent to Ms. Thompson. She has a specific place she will be staying. She has specific people who will be looking out for her and monitoring her activities. A copy of said plan will be filed with the Court.
4. The ends of justice would be served if Ms. King were released.

Wherefore, the defendant requests the following relief:

1. That a hearing on this motion be set and following that hearing, Ms. King be released on bond pending sentencing September 26, 2006.
2. All other appropriate relief.

RESPECTFULLY SUBMITTED,

s/James R. Cooper, Jr. (COO021)

COOPER & COOPER
Attorney for Defendant
312 Scott Street
Montgomery, AL 36104
(334) 262-4887

CERTIFICATE OF SERVICE

I hereby certify that on this the 28th day of August, 2006, I have served a copy of the foregoing **Motion to Release** upon Ms. Susan Redmond, Asst. U.S. Attorney, P.O. Box 197, Montgomery, Alabama 36101 and all other parties by electronic case filing, by placing a copy of same in the United States Mail properly addressed and postage prepaid.

S/ James R. Cooper, Jr.

cc:

Renee King
Autauga County Jail
Prattville, Al

Julia Webb
876 Boat Landing Rd
Gordon, Al 36343